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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ANDREW J. KORNECKI,  
Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,  
v.

AIRBUS SE, GUILLAUME M.J.D.  
FAURY, TOM ENDERS, DOMINIK  
ASAM, AND HARALD WILHELM,

Defendants.

Case No: 2:20-cv-10084-KM-JBC

**DECLARATION OF JAMES C.  
SHAH IN SUPPORT OF THE  
MOTION BY THE  
INTERNATIONAL UNION OF  
OPERATING ENGINEERS  
PENSION FUND OF EASTERN  
PENNSYLVANIA AND  
DELAWARE FOR (1)  
APPOINTMENT AS LEAD  
PLAINTIFF AND (2) APPROVAL  
OF ITS SELECTION OF LEAD  
COUNSEL**

I, James C. Shah, hereby declare as follows:

1. I am a Partner at Shepherd, Finkelman, Miller & Shah, LLP, proposed Lead Counsel for Movant, the International Union of Operating Engineers Pension Fund of Eastern Pennsylvania and Delaware (“Operating Engineers”). I make this Declaration in support of the Motion by Operating Engineers for Appointment as Lead Plaintiff and Approval of its Selection of Lead Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would completely testify thereto.

2. Attached hereto as Exhibit “A” is a true and correct copy of the PRNewswire press release regarding the above-captioned action dated August 6, 2020.

3. Attached hereto as Exhibit “B” is a true and correct copy of the Loss Chart of Operating Engineers.

4. Attached hereto as Exhibit “C” is a true and correct copy of the Certification of Operating Engineers.

5. Attached hereto as Exhibit “D” is a true and correct copy of the Firm Resume of Shepherd, Finkelman, Miller & Shah, LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of October, 2020, at Collingswood, New Jersey.

/s/ James C. Shah  
James C. Shah